

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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**In Re:**

**In Bankruptcy No:**

**ISRAEL MCKINNEY and  
JENNIFER MCKINNEY**

**Debtors.**

**Case No: 22-11558**

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**MOTION TO SHORTEN TIME OF NOTICE FOR DEBTOR'S MOTION TO SELL VEHICLE  
FROM 21 DAYS TO 7 DAYS**

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Israel and Jennifer McKinney, Debtors, by their attorneys PITTMAN & PITTMAN LAW OFFICES, LLC, by Greg P. Pittman hereby moves the Court for an Order Shortening the Time of Notice to Sell the vehicle from 21 days to 7 days.

**Dated this 6th day of March, 2023, at La Crosse, Wisconsin.**

**PITTMAN & PITTMAN LAW OFFICES, LLC**

**By: s/Greg P. Pittman  
Greg P. Pittman  
Attorney No. 1073787  
Attorney for Debtors  
712 Main Street  
La Crosse, WI 54601  
(608) 784-0841**

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**In Re:**

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**AFFIDAVIT IN SUPPORT OF MOTION TO SHORTEN TIME TO SELL VEHICLE FROM 21  
DAYS TO 7 DAYS**

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**STATE OF WISCONSIN                    )**  
  **) SS**  
**COUNTY OF LA CROSSE                )**

Greg P. Pittman being first duly sworn on oath deposes and states as follows:

1. I am the attorney for the Debtors and have been working with the Debtors to navigate the chapter 13 process.
2. As part of the Debtors' plan to help reduce day to day costs and expenses, the Debtors are seeking to sell the 2015 Land Rover LR4 to Don's Affordable Auto in Green Bay, WI. The vehicle has spent a considerable amount of time in the shop recently and the costs to repair the vehicle have been tremendous. The Debtors have recently paid \$5,000.00 in work performed over the last couple months and put a deposit down with Don's Affordable Auto of \$2,000.00 for additional parts/work.
3. Don's Affordable Auto currently has a 2007 Subaru Impreza that they are willing to sell for \$9,290.00. Don's Affordable Auto is currently holding both vehicles and is looking to have this transaction completed as soon as possible so they can get the Subaru off of their lot and start progress with the Land Rover LR4. The delay caused by the full 21 day notice drastically increases the risk Don's

Affordable Auto selling the Subaru before the Debtors have authority to complete the transaction.

5. This affidavit is in support of the Motion to Shorten Notice to Sell the Vehicle and Equipment from 21 days to 7 days.

s/Greg P. Pittman  
Greg P. Pittman

Subscribed and sworn to before me  
this 6th day of March, 2023.

s/Wanda Nickelotti  
Wanda Nickelotti, Notary Public  
My Commission expires: 3/3/2026.

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

**In Re:**

**In Bankruptcy No:**

**ISRAEL MCKINNEY and  
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**Debtors.**

**Case No: 22-11558**

**AFFIDAVIT OF SERVICE BY MAIL**

**STATE OF WISCONSIN                    )  
  ) SS  
COUNTY OF LA CROSSE                )**

The undersigned being first duly sworn states that a true copy of *Motion to Shorten Time, Affidavit In Support of Motion and Proposed Order*, was served upon the individuals on attached list by either electronic filing or by enclosing the same in an envelope postpaid for first class handling which bore the sender's name and return address and addressed to each such individual at their respective post office addresses and deposited in a U.S. Post Office depository in La Crosse, Wisconsin on March 6 , 2023.

**s/Wanda Nickelotti**  
**Wanda Nickelotti**

**Subscribed and sworn to before me  
this 6th day of March, 2023**

**s/Greg P. Pittman**  
**Greg P. Pittman, Notary Public**  
**My Commission is Permanent**

Label Matrix for local noticing  
 1758-1  
 Case 1-22-11558-rmb  
 Western District of Wisconsin www.wiwb.uscour  
 Lau Claire  
 Mon Mar 6 17:01:08 CST 2023

Attn: Bankruptcy  
 Po Box 250  
 Cottage Grove, MN 55016-0250

(p)AMERICOLLECT INC  
 PO BOX 2080  
 MANITOWOC WI 54221-2080

Theresa M. Anzivino  
 U.S. Department of Justice  
 222 West Washington Avenue  
 Suite 700  
 Madison, WI 53703-2775

Nathan Baney  
 DOJ-Tax  
 Civil Trial Section, Central Region  
 P.O. Box 7238  
 Washington, DC 20044-7238

Bonneville Collections  
 Po Box 150621  
 Ogden, UT 84415-0621

Credit Bureau Data Inc  
 Attn: Bankruptcy  
 118 State Street Po Box 2288  
 La Crosse, WI 54602-2288

Credit Collection Services  
 Attn: Bankruptcy  
 725 Canton St  
 Norwood, MA 02062-2679

Department of Treasury - Internal Revenue S  
 PO Box 7346  
 Philadelphia, PA 19101-7346

Enhanced Recovery Company  
 Attn: Bankruptcy  
 1014 Bayberry Road  
 Jacksonville, FL 32256-7412

Gundersen Health System  
 1900 South Ave.  
 La Crosse, WI 54601-5496

Mark Harring  
 122 West Washington Ave.  
 Suite 500  
 Madison, WI 53703-2758

IRS - Centralized Insolvency Operations  
 P.O. Box 7346  
 Philadelphia, PA 19101-7346

(p)US ATTORNEY'S OFFICE WESTERN DISTRICT OF W  
 ATTN ESA ANZIVINO  
 222 WEST WASHINGTON AVENUE  
 SUITE 700  
 MADISON WI 53703-2775

Sam E. Kaufman  
 Vande Zande & Kaufman, LLP  
 408 E. Main Street  
 PO Box 430  
 Waupun, WI 53963-0430

Marine Credit Union  
 Attn: Collections Dept  
 P.O. Box 309  
 Unalakleet, WI 54650-0309

Marine Cu  
 Attn: Bankruptcy  
 Po Box 309  
 Onalaska, WI 54650-0309

Israel R. McKinney  
 W5441 Innsbruck Rd  
 West Salem, WI 54669-9316

Jennifer McKinney  
 129 S. 2nd St. N. #322  
 West Salem, WI 54601

(p)NATIONAL SERVICE BUREAU  
 18912 NORTH CREEK PARKWAY  
 SUITE 205  
 BOTHELL WA 98011-8016

Greg P. Pittman  
 Pittman & Pittman Law Offices, LLC  
 712 Main Street  
 La Crosse, WI 54601-4121

SOUTHEASTERN EMERGENCY PHYSICIANS, LLC  
 c/o Wakefield & Associates, LLC  
 PO Box 51272  
 Knoxville, TN 37950-1272

Secretary of Treasury  
 Treasury Department  
 1500 Pennsylvania Avenue N.W.  
 Washington, DC 20220-0001

Securities and Exchange Commission  
 175 West Jackson Boulevard  
 Suite 900  
 Chicago, IL 60604-2908

U.S. Trustee's Office  
 180 Regent Street, Suite 304  
 Madison, WI 53715-2635

VISTA RADIOLOGY PC  
 c/o Wakefield & Associates, LLC  
 PO Box 51272  
 Knoxville, TN 37950-1272

(p)WAKEFIELD & ASSOCIATES  
 PO BOX 51272  
 KNOXVILLE TN 37950-1272

Wisconsin Department of Revenue  
 Special Procedures Unit  
 P.O. Box 8901  
 Madison, WI 53708-8901

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

mericollect, Inc.  
PO Box 1566  
Janitowoc, WI 54221

Internal Revenue Service  
United States Attorney's Office  
222 West Washington Avenue, Suite 700  
Madison, WI 53703

National Service Bureau, Inc  
18912 North Creek Parkway  
Suite 205  
Bothwell, WA 98011

Lakefield & Associates  
Attn: Bankruptcy  
1005 Middlebrook Pike  
Knoxville, TN 37909

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Wisconsin Dept. of Revenue  
Special Procedures Unit - PO Box 8901  
Madison, WI 53708-8901

End of Label Matrix	
Mailable recipients	27
Bypassed recipients	1
Total	28